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8 Attorneys for Chapter 7 Trustee Dina L. Anderson

9 **UNITED STATES BANKRUPTCY COURT**

10 **DISTRICT OF ARIZONA**

11 In re:

12 DAVID W. REMIERES AND  
13 JENNIFER F. REMIERES,

14 Debtors.

15 Chapter 7

16 Case No. 2:19-bk-12898-BKM

17 **MOTION FOR EXPEDITED HEARING ON  
18 MOTION TO APPROVE SALE OF REAL  
19 PROPERTY FREE AND CLEAR OF LIENS**

20 **(Hearing requested prior to August 18, 2020)**

21 Re: 9021 W. Elm Street, Unit 3  
22 Phoenix, AZ 85037  
23 Tax Parcel No. 102-83-349

24 Pursuant to Local Bankruptcy Rule 9013-1(h), Dina L. Anderson, the Chapter 7 Trustee  
25 (“Trustee”) in the David W. Remieres and Jennifer F. Remieres (“Debtors”) bankruptcy estate,  
26 by and through undersigned counsel, hereby requests an Order setting an expedited hearing on  
27 or before August 18, 2020 to consider the *Motion to Approve Sale of Real Property Free and*  
28 *Clear of Liens* (“Motion”).

1 **I. Contact Information for Other Parties**

2 The contact information for the interested parties is set forth as follows and are  
3 incorporated herein by this reference:

4 Dina L. Anderson  
5 *Chapter 7 Trustee*

6 Edwin Adrian Perez  
7 [edwin.adrian760@gmail.com](mailto:edwin.adrian760@gmail.com)  
8 *Buyer*

9 Office of the U.S. Trustee  
10 230 N. First Avenue, Suite 204  
11 Phoenix, AZ 85003-1706

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13 ///

14 ///

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(Account ending 7416)  
*Lien Holder*

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(Account ending 7416)  
*Lien Holder*

Maricopa County Tax Assessor  
301 West Jefferson St., Suite 100  
Phoenix, Arizona 85003  
*County Tax Assessor/Auditor*

AS&A Property Management  
c/o Vista Dos Day H.O.A.  
3802 N. 53<sup>rd</sup> Ave. #140  
Phoenix, AZ 85031

## II. Facts Showing Existence and Nature of Emergency

1. On October 9, 2019, the Debtors filed a Voluntary Petition for relief under Chapter 7 of the Bankruptcy Code.

2. Dina L. Anderson is the duly appointed Chapter 7 Trustee assigned to this case.

3. On August 3, 2020, the Trustee filed the *Motion to Approve Sale of Real Property Free and Clear of Liens* (“Motion”).

4. The Trustee requires an expedited hearing on the Motion as the Buyer requires the sale to close by August 24, 2020.

5. Any additional delay in entering an order approving the Motion could jeopardize the Property and the sale to the Buyer.

1           6.     As such, cause exists for this Court to set an expedited hearing on the Motion.

2           **III. Notice of Accelerated Hearing**

3           Copies of this motion were mailed, and sent via facsimile and/or e-mail where such  
4 contact information was available, to the Debtors, the Debtors' Attorney, the Trustee, the United  
5 States Trustee, the Trustee's court-appointed Realtor, the Buyer, the lender, Attorney for lender,  
6 any other prospective buyers and to any other parties requesting notice in this case.

7           **WHEREFORE**, Trustee respectfully requests that this Court set an expedited hearing on  
8 the Motion on or before August 18, 2020.

9           RESPECTFULLY SUBMITTED: August 3, 2020

10           **GUTTILLA MURPHY ANDERSON, P.C.**

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*/s/ Dawn M. Maguire #20368*

12           Dawn M. Maguire  
13           Attorneys for Chapter 7 Trustee

14           **E-FILED** on August 3, 2020 with the  
15 U.S. Bankruptcy Court and copies served  
via ECF notice on all parties that have  
16 appeared in the case.

17           **COPY** mailed and/or emailed the same date to:

18           Dina L. Anderson  
*Chapter 7 Trustee*

19           Office of the U.S. Trustee  
20           230 N. First Avenue, Suite 204  
Phoenix, AZ 85003-1706

21           William E Markov  
22           HARTLEY MARKOV LAW  
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*Attorneys for Debtor*

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25           Jennifer R. Remieres  
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26           Pawtucket, RI 02861  
*Debtors*

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28

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35 (Account ending 7416)  
36 *Lien Holder*

37 US Bank Home Mortgage  
38 PO Box 790415  
39 St. Louis, MO 63179-0415  
40 (Account ending 7416)  
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42 Maricopa County Tax Assessor  
43 301 West Jefferson St., Suite 100  
44 Phoenix, Arizona 85003  
45 *County Tax Assessor/Auditor*

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/s/ Monica J. Baca